

Exhibit 22

U.S. District Court
Eastern District of Virginia
Newport News Division

Tatyana A. Babakaeva
Plaintiff

v. Case No. 4:08cv129

Quadros & Associates, P.C.
Defendant

RESPONSE TO PLAINTIFF'S COMPLAINT

COMES NOW the Defendant, Quadros & Associates, P.C., and for its Response to Plaintiff's Complaint states the following:

1. Defendant neither confirms nor denies the claims and allegations contained in paragraph 1 of Plaintiff's Complaint and will require strict proof thereof.
2. Defendant neither confirms nor denies the claims and allegations contained in paragraph 2 of Plaintiff's Complaint and will require strict proof thereof.
3. Defendant neither confirms nor denies the claims and allegations contained in paragraph 3 of Plaintiff's Complaint and will require strict proof thereof.
4. Defendant agrees with the claims and allegations contained in paragraph 4 of Plaintiff's Complaint.
5. As to the claims and allegations contained in paragraph 5 of Plaintiff's Complaint Defendant states that it is not a debt collection agency but a law firm engaged in the business of debt collection.
6. Defendant agrees with the claims and allegations contained in paragraph 6 of Plaintiff's Complaint.
7. Defendant agrees with the claims and allegations contained in paragraph 7 of Plaintiff's Complaint.

8. Defendant neither confirms nor denies the claims and allegations contained in paragraph 8 of Plaintiff's Complaint and will require strict proof thereof.
9. Defendant neither admits nor denies the claims and allegations contained in paragraph 9 of Plaintiff's Complaint and strict proof thereof is required.
10. Defendant neither admits nor denies the claims and allegations contained in paragraph 10 of Plaintiff's Complaint and strict proof thereof is required.
11. Defendant neither admits nor denies the claims and allegations contained in paragraph 11 of Plaintiff's Complaint and strict proof thereof is required.
12. Defendant denies in part and admits in part the claims and allegations contained in paragraph 12 of Plaintiff's Complaint. Your Defendant did make written contact with the Plaintiff or on about November 13, 2007. In addition thereto, the USPS returned the address correction request for 1 Pelican Shores Drive, Hampton, VA to Quadros & Associates, P.C. indicating it was a good address.
13. Defendant admits the claims and allegations contained in paragraph 13 of Plaintiff's Complaint insofar as the letter being sent. Defendant neither admits nor denies the claims and allegations as to the letter being forwarded and strict proof thereof is required.
14. Defendant neither admits nor denies the claims and allegations contained in paragraph 14 of Plaintiff's Complaint and strict proof thereof is required.
15. Defendant admits the claims and allegations contained in paragraph 15 of Plaintiff's Complaint insofar as Plaintiff

set up a motion to vacate, which Defendant did not contest, and a new trial was set.

16. Defendant denies the claims and allegations contained in paragraph 16 of Plaintiff's Complaint in that the letter of February 27, 2008 did contain the necessary information. The warrant in debt is not required to contained said validation notice.
17. Defendant admits the claims and allegations contained in paragraph 17 of Plaintiff's Complaint in that Plaintiff showed the Court sufficient information to give this Defendant cause to believe that the initial service was inappropriate, which is why there was no contest. The Bill of Particulars is admitted.
18. Defendant neither admits nor denies the claims and allegations contained in paragraph 18 of Plaintiff's Complaint and strict proof thereof is required.
19. Defendant neither admits nor denies the claims and allegations contained in paragraph 19 of Plaintiff's Complaint and strict proof thereof is required.
20. Defendant admits in part and denies in part the claims and allegations contained in paragraph 20 of Plaintiff's Complaint. Mr. Wilson did not refuse to return the money to Plaintiff, but rather had a Court Order not to do anything with the money until the Court further ordered. Accordingly, he could not honor her request. As to the copy to Bryan Schempf and the notice, Defendant admits.
21. Defendant admits the claims and allegations contained in paragraph 21 of Plaintiff's Complaint.

22. Defendant denies the claims and allegations contained in paragraph 22 of Plaintiff's Complaint. Bryan Schempf is affiliated as he is ex-counsel for the ex-husband of Plaintiff and has an attorney's lien on the proceeds of the sale of the residence to include an actual lien, and accordingly, any attempt by Plaintiff to withdraw any or all of the funds directly affected Mr. Schempf, whose law firm is represented by the Defendant.

23. The language of paragraph 23 of Plaintiff's Complaint is nonsensical and, accordingly, the claims and allegations are denied by Defendant.

24. The language of paragraph 24 of Plaintiff's Complaint is nonsensical in that there is a spelling error and the plain English meaning of the words does not make sense and, accordingly, the claims and allegations are denied by Defendant.

25. As to the claims and allegations contained in paragraph 25 of Plaintiff's Complaint Defendant states that Raymond P. Bacon, Esq. is not a partner but an employee of Quadros & Associates, P.C. Defendant admits the remainder of the claims and allegations contained in paragraph 25 of Plaintiff's Complaint.

26. Defendant admits the claims and allegations contained in paragraph 26 of Plaintiff's Complaint insofar as stated.

27. Defendant admits the claims and allegations contained in paragraph 27 of Plaintiff's Complaint as to the letter and the contents thereof.

28. Defendant admits the claims and allegations contained in paragraph 28 of Plaintiff's Complaint in that that is the content of the letter.

29. Defendant admits the claims and allegations contained in paragraph 29 of Plaintiff's Complaint because Plaintiff filed an appeal to the judgment entered in the favor of Plaintiff Wilson and within the statutory time perfected same.

30. Defendant admits the claims and allegations contained in paragraph 30 of Plaintiff's Complaint, and Defendant asserts the truth thereof.

31. Regarding the claims and allegations contained in paragraph 31 of Plaintiff's Complaint, Defendant states no explanation was necessary.

32. No response required to paragraph 32 of Plaintiff's Complaint.

33. Defendant denies the claims and allegations contained in paragraph 33 of Plaintiff's Complaint.

34. Defendant denies the claims and allegations contained in paragraph 34 of Plaintiff's Complaint.

35. Defendant admits the claims and allegations contained in paragraph 35 of Plaintiff's Complaint in that the legal action was continued in an inappropriate venue; however, the initial warrant in debt was brought in Hampton because that was believed to be the venue wherein Plaintiff lived.

36. Defendant denies the claims and allegations contained in paragraph 36 of Plaintiff's Complaint.

37. Defendant denies the claims and allegations contained in paragraph 37 of Plaintiff's Complaint.

38. Defendant denies the claims and allegations contained in paragraph 38 of Plaintiff's Complaint.

39. Defendant denies the claims and allegations contained in paragraph 39 of Plaintiff's Complaint.

40. Defendant admits the claims and allegations contained in paragraph 40 of Plaintiff's Complaint insofar as inappropriate venue but denied as to all other reasons or basis.

WHEREFORE, it is requested by Defendant that this matter be dismissed in that the one violation of the statutes mentioned has been reimbursed to your Plaintiff, plus her costs.

Quadros & Associates, P.C.

By: /s/

Robert P. Quadros, Esq.
Virginia Bar Number 14402
Quadros & Associates, P.C.
2715 Huntington Avenue
Newport News, VA 23607
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CERTIFICATE OF SERVICE

I hereby certify that on the 4 day of March, 2009 I served a copy of the Response to Plaintiff's Complaint via regular U. S. Mail to the following:

Tatyana A. Babakaeva
2124 Criston Drive
Newport News, VA 23602
Plaintiff

/s/
Robert P. Quadros, Esq.
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